

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

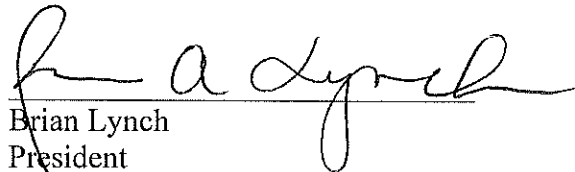
Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: February 22, 2019
2. Name of company covered by this certification: Antietam Cable Television, Inc.
3. Form 499 Filer ID: 826759
4. Name of signatory: Brian Lynch
5. Title of signatory: President
6. Certification:

I, Brian Lynch, certify that I am an officer of Antietam Cable Television, Inc. ("Company") and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures, summarized in the attached statement, that are adequate to ensure compliance with the customer proprietary network information ("CPNI") rules as set forth in Part 64, Subpart U of the of the Commission's rules, 47 C.F.R. §§ 64.2001 *et seq.*

The Company has not received any customer complaints in the past calendar year concerning unauthorized release of CPNI. The Company has not taken any actions in the past year against data brokers, including proceedings instituted or petitions filed by the company at either at state commissions, the court system, or at the Commission.

I hereby represent and warrant that the above certification is consistent with Section 1.17 of the Commission's rules, 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject a filer to enforcement actions.

A handwritten signature in black ink, appearing to read "Brian Lynch", is written over a horizontal line.

Brian Lynch
President
Antietam Cable Television, Inc.
Executed February 21, 2019

ANTIETAM CABLE TELEVISION, INC.
STATEMENT OF CPNI OPERATING PROCEDURES

Antietam Cable Television, Inc.'s ("Company") written CPNI Operating Procedures ensure that Company will be in compliance with 47 U.S.C. § 222 and the rules contained in Title 47 of the Code of Federal Regulations (47 C.F.R. § 64.2001 *et seq.*). Included among the provisions of Company's CPNI Operating Procedures are:

- A requirement that Company at all times has a CPNI Compliance Supervisor to supervise the implementation of Company's CPNI Operating Procedures.
- Detailed procedures for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI in compliance with FCC rules.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI.
- Detailed procedures for obtaining opt-out and opt-in approval from customers, where required.
- A requirement that the billing system records for customers' accounts allow the status of the customer's CPNI approval to be easily ascertained.
- A requirement for supervisory approval of all outbound marketing campaigns, including determination of any customer approval requirements for the campaigns, and maintenance of a record of sales and marketing campaigns that use customers' CPNI, or of instances where CPNI is disclosed to third parties, or where third parties were allowed access to CPNI.
- A requirement that personnel be trained as to when they are and are not authorized to use CPNI.
- A supervisory review process regarding compliance with its CPNI policy, and a written disciplinary process for misuse of CPNI.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI. In the event of any breach of a customer's CPNI as described in section 64.2011 of the FCC's rules, the Company will, as soon as practicable and in all events within seven (7) days of determination of the breach, notify law enforcement through <http://www.fcc.gov/eb/cpni> and subsequently notify the customer(s), in accordance with the procedures and in the sequence prescribed by that rule. The Company will maintain a record of any such breaches and notifications for at least two (2) years.